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UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - NORTHERN DIVISION				
IN RE	CHAPTER 13 CASE NO. 9:22-bk-10383-RC			
Linda M Ramirez	TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN; DECLARATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION			
DEBTOR	DATE/TIME: August 18, 2022 10:00 am Courtroom 201 1415 State Street Santa Barbara, CA 93101			

The Trustee objects to confirmation of the plan because all requirements for confirmation as set forth in Title 11 of the United States Code and the Rules have not been met.

The Trustee requests, should all requirements not be met, that confirmation of the plan be denied, the case be dismissed or converted to Chapter 7 and for such other relief as the Court may deem appropriate.

THE FAILURE OF THE DEBTOR (OR THE ATTORNEY FOR THE DEBTOR) TO APPEAR AT THE CONFIRMATION HEARING, OR TO FULLY COMPLY WITH ALL REQUIREMENTS FOR PLAN CONFIRMATION, MAY RESULT IN DISMISSAL OR CONVERSION OF THE CASE.

DATED: July 18, 2022 /s/ Elizabeth F. Rojas

I, Elizabeth F. Rojas, declare as follows:

- I am the Trustee in this matter, Linda M Ramirez, 9:22-bk-10383-RC, and I have personal knowledge files and records kept by my office in the regular course of business. I have personally reviewed the files and records kept by my office in the within case. The following facts are true and correct and within my own personal knowledge and I could and would testify competently thereto if called upon to do so.
- I object to confirmation of the proposed plan because of the deficiencies set forth in the attached which is incorporated herein by reference. These deficiencies existed prior to or at the time of the 11 USC §341(a) meeting in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Sherman Oaks, California on July 18, 2022.

/s/ Elizabeth F. Rojas

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Linda M Ramirez

	onfirmation because th	e Deptor has ta	illea to:		
schedule debts within the limits of 11 USC §109(e); and therefore ineligible ; and/or Debtor is not eligible to be a Chapter 13 Debtor as follows:					
	se [11 USC §521, LBR ssets creditors		prior case		
serve all creditors using court mandated notice form with a copy of the plan pursuant to FRBPs 2002(b), 7004 and LBR 3015-1(b)(3);					
x provide the Trustee documentation of all income (as well as any contributor's income) seven days before the §341(a) Meeting of Creditors. LBR 3015-1(c)(3), 11 USC § 521; - Completed.					
meet th 3015-1	ne business reporting (c)(4);	requirements	regarding Debto	or's business or s	self-employment, LBI
provide to the Trustee completed copies of the Federal and State income tax returns , 11 USC §§ 1308 and 521, LBR 3015-1(c)(3).					
propose a plan that is feasible 11 USC § 1325(a)(6); the plan is infeasible because certain claims are not included and/or the amount provided is insufficient					
Comparison o	f Eilad Claima ta Clai				
	i Filed Ciaillis to Ciai	ms Stated in Pl	an:		
<u>Creditor</u>	Acct #	<u>Class</u>	<u>Claim</u>	<u>Plan</u>	Notes
<u>Creditor</u> Wells Fargo	<u>Acct #</u> 7361	<u>Class</u> 2	<u>Claim</u> \$1,146	\$775	2TD/Equity line
Creditor Wells Fargo Wells Fargo	Acct #	Class 2 2	<u>Claim</u> \$1,146 \$4,753	\$775 \$3,450	2TD/Equity line 1TD
<u>Creditor</u> Wells Fargo	<u>Acct #</u> 7361	Class 2 2 3C	Claim \$1,146 \$4,753 no poc filed	\$775	2TD/Equity line
Creditor Wells Fargo Wells Fargo	Acct # 7361 3059	Class 2 2 3C ficient enough to	Claim \$1,146 \$4,753 no poc filed	\$775 \$3,450	2TD/Equity line 1TD
Creditor Wells Fargo Wells Fargo	Acct # 7361 3059 income is not suf	Class 2 2 3C ficient enough to I not retire debt we to the propose treatm	Claim \$1,146 \$4,753 no poc filed of fund it vithin term ent and/or prop	\$775 \$3,450 \$9,234 erly treat all sche	2TD/Equity line 1TD HOA
Creditor Wells Fargo Wells Fargo LBPM HOA	Acct # 7361 3059 income is not suf plan payment will the plan does not	Class 2 2 3C Ificient enough to t propose treatm reditors; and/or p	Claim \$1,146 \$4,753 no poc filed of fund it vithin term ent and/or propolan deficiencies	\$775 \$3,450 \$9,234 erly treat all sche s as follows: SC §1322; 11 US	2TD/Equity line 1TD HOA
Creditor Wells Fargo Wells Fargo LBPM HOA	Acct # 7361 3059 income is not suf plan payment will the plan does not and/or secured cose a plan that represen	Class 2 2 3C Ificient enough to t propose treatm reditors; and/or p ts the Debtor's t d/or unnecessar	Claim \$1,146 \$4,753 no poc filed of fund it vithin term ent and/or propolan deficiencies pest effort 11 U y expenses are	\$775 \$3,450 \$9,234 erly treat all sche s as follows: SC §1322; 11 US scheduled	2TD/Equity line 1TD HOA
Creditor Wells Fargo Wells Fargo LBPM HOA	Acct # 7361 3059 income is not suf plan payment will the plan does not and/or secured comes a plan that represen unreasonable and	Class 2 2 3C ficient enough to t propose treatm reditors; and/or p ts the Debtor's to d/or unnecessar us exceeds the m Means Test as re	Claim \$1,146 \$4,753 no poc filed ofund it within term ent and/or propolan deficiencies pest effort 11 U y expenses are nonthly plan pay	\$775 \$3,450 \$9,234 erly treat all sche is as follows: SC §1322; 11 US scheduled	2TD/Equity line 1TD HOA duled, priority
Creditor Wells Fargo Wells Fargo LBPM HOA propos	Acct # 7361 3059 income is not suf plan payment will the plan does not and/or secured complete and the budget surplu comply with the M	Class 2 2 3C ficient enough to I not retire debt w t propose treatm reditors; and/or p ts the Debtor's t d/or unnecessar us exceeds the m Means Test as re Lanning, 1330 S	Claim \$1,146 \$4,753 no poc filed ofund it within term ent and/or propolan deficiencies pest effort 11 U y expenses are nonthly plan pay equired by the C 6.Ct.2464	\$775 \$3,450 \$9,234 erly treat all sche is as follows: SC §1322; 11 US scheduled ment ode, In re Kagen	2TD/Equity line 1TD HOA duled, priority SC §1325 veama, 541 F3d

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In Re: Linda M Ramirez		Chapter 13
	Debtor(s)	Case Number: 9:22-bk-10383-RC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 15260 Ventura Blvd., Suite 710, Sherman Oaks, CA 91403

A true and correct copy of the foregoing document entitled: TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN; DECLARATION; NOTICE OF POSSIBLE DISMISSAL OR CONVERSION will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orde checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons ar

and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 7/18/2022, I on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: UNITED STATES TRUSTEE (ND): USTPREGION16.ND.ECF@USDOJ.GOV JOHN K ROUNDS: JROUNDS@RSLAWLLP.COM Service information continued on attached page 2. SERVED BY UNITED STATES MAIL: On 7/18/2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed. LINDA M RAMIREZ, 2213 MIRAMAR WALK, OXNARD, CA 93035 Service information continued on attached page 3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P.5 and/or controlling LBR, on 7/18/2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed. HONORABLE JUDGE RONALD A CLIFFORD III - VIA OVERNIGHT MAIL Service information continued on attached page I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. 7/18/2022 Sophia Lawrence /s/ Sophia Lawrence Printed Name Date Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.